



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-2

Paul Krupa, Treasurer  
District No 1-PCD MEBA Political  
Action Fund (MEBA-PAF)  
444 North Capitol Street NW, Ste. 800  
Washington, DC 20001

NOV 6 1996

Identification Number: C00279380

Reference: September Monthly Report (8/1/96-8/31/96)

Dear Mr. Krupa:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Line 17 of the Detailed Summary Page discloses receipts for dividends and interest during the reporting period. If this figure includes any receipts from a single source, that aggregate greater than \$200 in the calendar year, please amend your report(s) by itemizing the receipts on Schedule A. 2 U.S.C. §434(b)(2)(J)

-Please provide a Schedule H3 to support the entry reported on Line 18 of the Detailed Summary Page. All transfers received from a committee's non-federal account for joint activity must be itemized on Schedule H3 regardless of the amount transferred. 2 U.S.C. §434(b)(3)(D)

-Please clarify all expenditures made for Maritime participation Labor Day Salute on Schedule B. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedule B or E supporting Line 23 or 24 and include the amount, name, address and office sought by each candidate. 11 CFR §104.3(b)

-Line 18 of the Detailed Summary Page of your report discloses a total of \$80,000 in transfers from your non-federal account for joint activity. However, your committee does not appear to have ever paid for joint allocable expenses from your federal account. Please clarify this discrepancy. If your committee has received a transfer from your non-federal account for any purpose other than the payment of joint allocable expenses, be advised that such a transfer is prohibited by 11 CFR §102.5(a)(1)(i) and the full amount of the transfer(s)

should be returned to the non-federal account. Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out. In addition, the transfer-out should be disclosed on Schedule B supporting Line 22 of your next report.

If this transaction represents an "internal transfer" of funds from one federal account to another, and the source(s) of such funds has been identified in previous reports of receipts and disbursements, please note that such transfers should not be itemized as doing so inflates total receipts and cash on hand. If this is the case, please amend your report accordingly.

Although the Commission may take further legal action regarding the acceptance of funds from a non-federal account, your prompt transfer-out of the impermissible funds or clarification of the transaction, will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Andrew J. Dodson  
Senior Reports Analyst  
Reports Analysis Division

